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Janina M. Hoskins, Trustee in Bankruptcy

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

In re

CARL ALEXANDER WESCOTT and  
MONETTE ROSEMARIE STEPHENS,

Debtors.

Case No.: 12-30143 DM  
(Chapter 7)

AP No. 12-3148

**DECLARATION OF JAY CROM IN  
REGARD TO SUPPLEMENTARY  
REPORT ON THE FINANCIAL  
AFFAIRS OF THE DEBTORS**

JANINA M. HOSKINS, Trustee in  
Bankruptcy of the Estate of Carl Alexander  
Wescott and Monette Rosemarie Stephens,

Plaintiff,

v.

CARL ALEXANDER WESCOTT and  
MONETTE ROSEMARIE STEPHENS,

Defendants.

Date: OCTOBER 2, 2013

Time: 9:30 AM

Location: United States Bankruptcy Court  
235 Pine Street, 19th Floor  
Courtroom 22

Judge: Honorable Dennis Montali

I, Jay Crom, declare:

1. I am a Certified Public Accountant, Certified Fraud Examiner and the managing partner of Bachecki, Crom & Co., LLP ("Bachecki"). I head up the firm's bankruptcy services area, and have extensive experience in financial consulting, transfers and insolvency analysis and bankruptcy and receivership accounting. I have served as an Examiner in numerous Chapter 11 bankruptcy cases and have been admitted as an expert in the Northern District of California Bankruptcy Court, in all four divisions. Except as otherwise indicated, all statements in this Declaration are based on my personal knowledge or my review of relevant documents, and if

called and sworn as a witness, I could and would competently testify to the facts set forth herein.

2. I am personally familiar with each of the facts stated herein, except those stated to be my understanding, which are matters on which I formed my information and belief in the course of my work in this matter.

3. I certify that the attached Expert Report is correct.

4. A summary of my education and experience is included in my Expert Report.

5. I previously produced a report dated April 2, 2013 ("the April Report") and summarized my investigations concerning certain Debtor transactions and assertions concerning their assets and financial affairs. It was called an "Interim Report" because the Debtors have been uncooperative with respect to the production of financial records, as is documented in our reports. I reserved the right to update and amend my report as additional documents are discovered and become available. At the time the April report was produced, the Trustee had just discovered dozens of boxes of accounting records and several computers located at an undisclosed storage facility paid for by the Debtors. The records were first discovered by the Trustee on March 21, 2013 when the Trustee, Attorney Jean Barnier and a member of my firm, Austin Wade, CPA, identified and briefly inspected the records at the storage facility. As of April 2, 2013 I had not had time to review the dozens of boxes of records and 6 computers found at the storage facility. This supplemental report is primarily intended to include additional information that we have discovered since April 2, 2013 including information in previously obtained records that I determined was highly significant because of information learned from review of the records obtained from the storage facility.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, that I have personal first-hand knowledge thereto, that if I was called as a witness, I could and would testify competently thereto, and that this declaration was executed on August 30, 2013 in San Francisco, California.

/s/ Jay Crom  
JAY CROM